

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
CLEVELAND, OHIO

FRANK DOMINIC DUNDEE,	)	CASE NO. 1:19 CV 01141
	)	
Plaintiff,	)	JUDGE DAN AARON POLSTER
	)	
vs.	)	MAGISTRATE JUDGE JONATHAN D.
	)	GREENBERG
UNIVERSITY HOSPITALS	)	
CORPORATION,	)	<b>DEFENDANT’S MOTION FOR</b>
	)	<b>PROTECTIVE ORDER</b>
Defendant.	)	
	)	

Defendant University Hospitals Health Systems, Inc. (“University Hospitals”) hereby moves for entry of a Protective Order to govern the production and disclosure of confidential and sensitive information in this case. University Hospitals’s proposed Protective Order is attached hereto.

As part of discovery in this matter, University Hospitals expects to produce documents of a personal and/or confidential nature. Specifically, documents relating to Plaintiff’s alleged or perceived disability, Plaintiff’s referral to an EAP (Employee Assistance Program) and sensitive documents relating to individuals who are not parties to this lawsuit are likely to be produced. University Hospitals seeks a Protective Order to ensure that such documents are used only for the purpose of this litigation, that their confidentiality is maintained and that they be returned at the conclusion of this litigation.

On February 3, 2020, University Hospitals presented a draft Stipulated Confidentiality Agreement and Protective Order to Plaintiff and requested that he consider entering into such an agreement to govern the handling of confidential documents. Plaintiff declined to enter into a Stipulated Confidentiality Agreement with University Hospitals.

As a result, University Hospitals therefore respectfully requests that this Court enter the attached proposed Protective Order.

Respectfully submitted,

/s/Rachael L. Israel

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***Counsel for Defendant University Hospitals  
Health Systems, Inc.***

### **CERTIFICATE OF SERVICE**

A copy of the foregoing *Defendant's Motion for Protective Order* has been filed electronically this 21st day of February 2020 and a true and correct copy of was served via email upon the following Parties:

Frank Dominic Dundee  
7707 Amberwood Trail  
Boardman, Ohio 44512  
***Pro Se Plaintiff***

/s/ Rachael L. Israel

***Counsel for Defendant University Hospitals  
Health Systems, Inc.***